

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

Substantively Consolidated

In re:

BERNARD L. MADOFF,

Debtor.

**[PROPOSED] ORDER GRANTING TRUSTEE’S MOTION
TO CORRECT RECORD ON APPEAL IN PROFIT WITHDRAWAL MATTER**

Upon consideration of the Trustee’s Motion (the “Motion”), [ECF No. _____], dated September __, 2018, filed by Irving H. Picard, as trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. § 78aaa *et seq.*, and the chapter 7 estate of Bernard L. Madoff, and it appearing that due and proper notice of the Motion and the relief requested therein have been given; and no other or further notice needs to be given; and the Court having reviewed the Motion, the record on appeal as filed by Appellant Aaron Blecker on behalf of himself and other participating claimants, ECF No. 17922, the Trustee’s designation of additional items to be included in the record on appeal, ECF No. 17956; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for relief granted herein, and after due

deliberation and sufficient cause appearing therefor, **IT IS HEREBY:**

ORDERED, that the relief requested in the Motion is hereby granted as set forth herein;
and it is further

ORDERED, that the 106 exhibits filed with the Appellants' designation of the record on
appeal on the Court's docket at ECF No. 17922-1 to 17922-106 are hereby stricken from the
docket; and it is further

ORDERED, that the Trustee is directed to file true and correct copies of all exhibits in the
Appellants' designation of the record on appeal, with the exception of exhibits PCX053 and
PCX091; and it is further

ORDERED, that exhibits PCX053 and PCX091 are hereby stricken from the Appellants'
designation of the record because they were not part of the trial record; and it is further

ORDERED, that this Court shall retain jurisdiction to hear and determine all matters
arising from or related to this Order.

Dated: New York, New York
_____, 2018

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE